

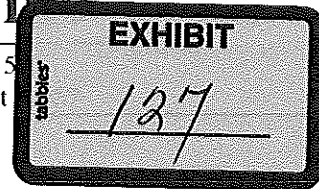
Town of

Office of Water & Sewer Commission
Tel: 860-739-6931 • Fax: 860-739-6930



East Lyme

Post Office Box 5
Niantic, Connecticut



BUREAU OF WATER PROTECTION AND LAND REUSE
OFFICE OF THE BUREAU CHIEF

January 28, 2010

FEB 02 2010

Paul Stacey, Director
Bureau of Water Protection & Land Reuse
Connecticut Department of Public Health
79 Elm Street
Hartford, CT 06106-5127

Re: Proposed Stream Flow Regulations

Dear Mr. Stacey:

The Town of East Lyme Water and Sewer Commission is responsible for providing water service to approximately 15,000 people. Its customer base includes residential, state and municipal government, commercial and industrial properties. State facilities served by the East Lyme water system include two prisons operated by the Department of Correction, Camp Reil, Stones Ranch and Rocky Neck State Park.

East Lyme's supply consists of seven wells located in the Pattaganasett River and Bride Brook aquifers. Four of the wells are registered with the Department of Environmental Protection (DEP) and have been operating for over thirty years. The remaining three wells operate under water diversion permits issued by the DEP.

The average day demand of the water system is approximately 2.1 million gallons per day (mgd). Because East Lyme is a shoreline community with a population that grows from approximately 18,000 to 30,000 people during the summer, it experiences a peak demand of approximately 3.5 mgd.

Already due to water diversion permit conditions, East Lyme is required to shut down two wells and limit the pumping on a third well when stream flows in the Pattaganasett River and Bride Brook reach "low-flow" triggers. These conditions usually occur during the summer time when demand is the highest. The shut down of these wells results in a loss of over 900,000 gallons per day and causes a water supply deficit.

East Lyme, however, is finding ways to manage its water supply and reduce its peak summertime demands. In the past two years East Lyme has instituted mandatory water conservation during the summer, has conducted a system-wide leak detection survey and is embarking on a wide spread meter replacement program. In addition, replacement wells are being constructed to make up for lost capacity and other infrastructure improvements are being made to increase operational efficiency and reliability. East Lyme has committed over \$6 million dollars toward these initiatives.

While these efforts are beneficial, they will not be enough to meet our current, let alone future water supply demands. With that, East Lyme is also embarking on a regional interconnection project with the City of New London to increase supply. This project will allow the transfer of water in both directions depending on need and will promote the prudent management of water resources on a regional level. This project is estimated to cost \$10 million dollars.

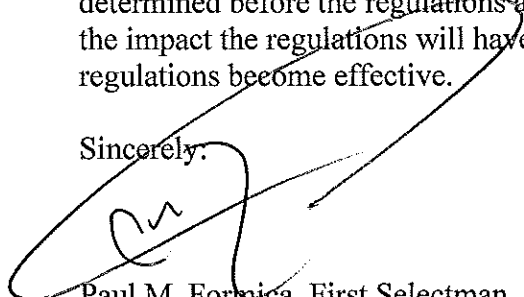
The proposed stream flow regulations will severely impact East Lyme's water supply, potentially reducing its available capacity by greater than 50%. With all of the money that East Lyme is spending to improve its water system, it will still not be enough to comply with these regulations.

These regulations will limit East Lyme's ability to provide adequate water supply to its customers for public health and safety, and will erode its opportunity to sustain the economic viability of the town.

The Town of East Lyme Water and Sewer Commission firmly opposes the stream flow regulations as currently drafted.

East Lyme believes that the Class assignments for each river and stream should be determined before the regulations are adopted, and should then be required to quantify the impact the regulations will have on each water supply system before any new regulations become effective.

Sincerely,



Paul M. Formica, First Selectman
Town of East Lyme